



January 17, 2013

Mr. Chet Pucillo
Manager
Rahway Arch Properties, LLC
7 Nottingham Drive
Florham Park, New Jersey 07932

RE: Rahway Arch Site Remediation – Detailed Alternatives Analysis

Dear Chet:

On November 27, 2012, I prepared and approved the Remedial Action Workplan¹ (RAW) for remediation of the Rahway Arch Site in Carteret, New Jersey. This RAW was prepared following my ongoing evaluation of this site since June 2010 including an initial fill material investigation², a preliminary assessment³ (PA) and remedial investigation (RI)⁴. All of the work has been performed in accordance with the requirements of the NJDEP – Site Remediation Program, including the Administrative Requirements for Remediation of Contaminated Sites (ARRCS – NJAC 7:26C) and the Technical Requirements for Site Remediation (Tech Rule – NJAC 7:26E).

The reports have been submitted to SRP. According to the DataMiner on-line database, initial inspections of the reports were completed by SRP on December 11, 2012 and component reviews of the reports were completed by SRP on December 14, 2012. We are proceeding with the site remediation as required by SRP regulations. An application has been made to the NJDEP - Land Use Regulation Program (LURP) for Coastal, Wetland and Flood Hazard Area Permits⁵ for the site remediation. In its December 28, 2012 Notice of Deficiency⁶ (NOD) to the permit applications, LURP requested a detailed alternatives analysis of the remedial action.

¹ EastStar Environmental Group, Inc., *Remedial Action Workplan for the Rahway Arch Properties Site*, November 27, 2012.

² EastStar Environmental Group, Inc., *Environmental Investigation of Fill Material at the Rahway Arch (old Cytec Landfill) Site*, October 17, 2011.

³ EastStar Environmental Group, Inc., *Preliminary Assessment at the Rahway Arch Properties Site*, August 7, 2012.

⁴ EastStar Environmental Group, Inc., *Remedial Investigation Report for the Rahway Arch Properties Site*, November 15, 2012.

⁵ J. Timothy Kernan, Inc., *Application for: Coastal General Permit #15; Freshwater Wetlands General Permit #4 and #11; Flood Hazard Area Verification; Flood Hazard Area Individual Permit and Flood Hazard Area-Hardship Exception for Rahway Arch Properties – Site Remediation*, November 2012.

⁶ NJDEP, Office of Dredging and Sediment Technology, *Letter Regarding Flood Hazard Area Individual Permit/Verification, Freshwater Wetlands General Permit #4 and #11, CAFRA General Permit #15 Application No(s): 1201-03-0003.3 FWW 120001, FWW 120002, FHA 120001, FHA 120001, CAF 120001*, December 28, 2012.

A detailed alternatives analysis is not required by the Tech Rule. However, in response to the NOD letter, I have performed the analysis. This was done using the guidelines contained in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP - 40 CFR 300.430). These guidelines involve analyzing the remedial alternatives for a site relative to effectiveness, implementation and cost. Alternatives that meet these requirements are further evaluated based on nine criteria mandated by CERCLA and SARA, consisting of:

1. Overall protection of human health and the environment
2. Compliance with applicable or relevant and appropriate requirements (ARARs)
3. Long-term effectiveness and permanence
4. Reduction of toxicity, mobility, or volume
5. Short-term effectiveness
6. Implementability
7. Cost
8. State acceptance
9. Community acceptance.

The results of this requested detailed alternatives analysis are contained in this letter.

It is important to note that this analysis is performed retrospectively to where we are today in the remedial design and engineering process. I understand that in years past you have canvassed the industry in search of various remedial alternatives that are applicable to your site. Likewise, for years the prior site owners explored many potential solutions to remediate and even develop the site with little success. In that regard, the fundamental content of the enclosed alternatives analysis has been addressed for some time, simply never documented in this specific format. Further, I am aware of your repeated efforts to incorporate a wide range of potential capping materials including dredge materials; only to find each of those solutions unfeasible for a variety of reasons. The selection of the current process and remedy was after all of this consideration and effort.

The purpose of this analysis is not to contest the remedy selection, rather to underscore the rationale and fundamental underpinning of that selection in the requested format. To that end, while this analysis may appear largely contemplative of past decisions and situations, it was requested by NJDEP as part of their current review.

As a final preface note, cost is presented in this alternatives analysis absent of any consideration for recovery, offset or costs paid by others. Clearly, given that the remediation is self-funded, that concept was integrated into the original analysis. However, the cost analysis presented herein follows a commonly used format for public or PRP-funded projects. While this may not seem relevant to your privately funded project, it is inherent to this presentation format. You should also note that the costs associated with each task under the various alternatives are predicated on the alternative meeting the site engineering specifications, including without exception, the geotechnical and LSRP requirements.

Site Description

The Rahway Arch site is a 124.7 acre property located at the terminus of Salt Meadow Road (formerly Driftway Street) in Carteret, New Jersey. It is more precisely defined as Block 602, Lot 1; Block 603, Lot 1 and Block 705, Lot 18. This property was formerly defined as Block 9.03, Lot 21; Block 10, Lots 8-10 and 12-21 and Block 11.01, Lots 8, 10-14 and 28. The remediation project site also includes portions of two properties owned by the Borough of Carteret, Block 602, Lot 8 (formerly defined as Block 10, Lot 11) and Block 705, Lot 17 (formerly defined as Block 11.01, Lot 9).

The project site is the old Cytec Impoundments site, a former industrial waste disposal facility operated by American Cyanamid Company (now Cytec Incorporated) from the mid-1930s through 1974 to dispose of a mixture of acidic sludge from an alum manufacturing process and alkaline sludge from a yellow prussiate of soda (YPS) manufacturing process, along with other wastes generated by American Cyanamid at its Warner Plant, located at Tremley Point in Linden, New Jersey

The site contains six impoundments, encompassing approximately 85 acres. The impoundments were constructed above existing grade with wooden and earthen dikes. They currently contain approximately 2,000,000 tons of the cyanide containing alum-YPS sludge. The size and capacity of each of the impoundments varies, as does the thickness of the sludge, which ranges from 5 to 20 feet.

Undocumented fill material was imported and used on the site over the years to maintain the dikes and to stabilize the surface in several of the impoundments. This fill material was imported from various sites, including the Warners Plant, over the years for operations and maintenance of the disposal areas.

The site is currently unusable. Most of Impoundments 1 and 6 are filled with standing water. Vegetative cover is either sparse or non-existent over most of the area of the remaining impoundments, with the exception of Impoundment 1 and the low areas of Impoundment 3. A 12 inch cover of soil and sewage sludge had been placed over the impoundments from 1986 through 1989 to promote vegetative growth. This cover has been eroded away in most locations leaving exposed alum-YPS sludge. Phragmites have grown in the soil on the berms and the roadways surrounding the impoundments.

The impoundments are impassable and are unsafe for foot or vehicular traffic because the sludge has no strength and cannot bear any weight. A pole or rod can be pushed by hand its full length into the sludge with minimal effort. This creates a dangerous condition for persons, vehicles and wildlife on the site and makes the site, in its current condition, unusable.

Fourteen areas of concern (AOCs) were identified in the PA and were investigated for remediation. The RI determined that 10 of the AOCs were contaminated and required remediation. Refer to the previously referenced PA, RIR and RAW reports for additional details on the site and the AOCs.

Remedial Objectives

The RI confirmed that the alum-YPS sludge in the impoundments and the undocumented fill material in the impoundments and on the berms contain metals, cyanide and PAHs above non-residential soil direct contact remediation criteria and soil impact to groundwater screening levels. The groundwater on the site, sampled through the sixteen existing groundwater monitoring wells, is also contaminated with metals and cyanide.

Additionally, the site in its current condition is unusable and poses a safety risk to the public. Geotechnical data showed that the alum-YPS sludge in the impoundments and the underlying peat and clay layers have minimal undrained strength. In their current state, these layers cannot support a load that would allow the site to be usable.

Based upon these results, the following remedial objectives were developed in order to properly remediate the site as required under the SRP regulations and guidelines. The remediation objectives are:

- ❑ Eliminate direct contact hazards with contaminated surface fill and alum-YPS sludge
- ❑ Prevent precipitation from coming in contact with the contaminated materials and discharging to groundwater or surface water
- ❑ Eliminate the bathtub-like impoundments that trap precipitation against the contaminated materials and perpetuate the saturated weakness of the underlying layers
- ❑ Promote runoff and evapotranspiration of precipitation rather than infiltration
- ❑ Ensure the long term integrity of the berms
- ❑ Eliminate site safety hazards posed by soft soils and sludge and ponded water in the impoundments
- ❑ Raise the entire site above the 100-year floodplain and prevent inundation by the Rahway River
- ❑ Allow safe passive uses, including habitat, and possible future development on a portion of the site by the property owners, making at least a portion of the site usable.

The remedial action necessary to meet these objectives will consist of a combination of engineering and administrative controls.

Remediation Alternatives

EastStar reviewed a number of alternatives for site remediation. Alternatives were initially screened for technical feasibility and use of available technology. Alternatives that were determined to not be technically feasible or that required the use of unproven or unreliable

technologies were immediately screened from the list and were not given any further evaluation.

The remaining alternatives, described below, were then evaluated using the remediation objectives and the evaluation criteria from the NCP that were developed by the U.S. EPA for evaluation of remediation alternatives at Superfund sites. These evaluation criteria are described in the next section of this letter report.

Alternative 1 – Do Nothing

This alternative is required by the NCP as the baseline for evaluation of the other alternatives. This alternative consists of leaving the site in its present condition and not performing any remedial action on the site. This alternative does not provide any engineering or administrative controls and does not meet any of the remediation objectives.

Alternative 2 – Removal and Replace with Clean Fill

This alternative consists of removing all of the contaminated materials, consisting of approximately 2,000,000 tons of alum-YPS sludge and an unknown quantity of contaminated undocumented fill, to an off-site location for disposal. The site would then be restored by backfilling with clean fill. A grading plan would need to be developed to determine the configuration of the restored site.

This option would eliminate all of the existing site hazards and would comply with all of the remediation criteria. However, this alternative is complicated by the fact that a significant portion of the contaminated materials is below the groundwater table on the site. Installation of sheeting and shoring and dewatering of the excavation will be required in order to provide access. The contractor's ability to compact the backfill below the water table will be questionable, likely limiting this portion of the backfill to coarse materials that will not require compactive effort when placed.

Alternative 3 – In-situ Stabilization and Fill

This alternative consists of performing in-situ stabilization of the existing surface materials, primarily the alum-YPS sludge and undocumented fill materials. Following stabilization, the site would then be filled with clean fill. The fill will be placed in accordance with an approved grading plan that will raise the elevation above the flood level, provide positive drainage and provide for future site development.

The fill will likely be more permeable than the underlying alum-YPS sludge, resulting in water being trapped inside the impoundments. This water will eventually result in soft conditions at the base of the fill, potentially undermining the long-term stability of the site and limiting the potential for future development. This water will also percolate through the contaminated alum-YPS sludge and undocumented fill, continuing the existing groundwater and surface water concerns. This fill will not provide structural stabilization of the existing perimeter berms.

Alternative 4 – Fill with Alternative Fill

This alternative consists of filling the site with alternative fill that meets the guidelines contained in the RAW and is approved by the LSRP. The alternative fill will be placed and compacted as received and will not be screened or processed. The fill will be placed in accordance with an approved grading plan that will raise the elevation above the flood level, provide positive drainage and provide for future site development.

The fill will likely be more permeable than the underlying alum-YPS sludge, resulting in water being trapped inside the impoundments. This water will eventually result in soft conditions at the base of the fill, potentially undermining the long-term stability of the site and limiting the potential for future development. This water will also percolate through the contaminated alum-YPS sludge and undocumented fill, continuing the existing groundwater and surface water concerns. This fill will not provide structural stabilization of the existing perimeter berms.

Alternative 5 – Fill with Alternative Fill and Install a Geomembrane Cap

This alternative consists of filling the site with alternative fill that meets the guidelines contained in the RAW and is approved by the LSRP. The alternative fill will be placed and compacted as received and will not be screened or processed. The fill will be placed in accordance with an approved grading plan that will raise the elevation above the flood level, provide positive drainage and provide for future site development. The fill will not provide structural stabilization of the existing perimeter berms.

A geomembrane cap layer will be placed over the alternative fill to provide a low permeability surface. This will eliminate the problem of water from being trapped in the impoundments identified with Alternatives 3 and 4. This option will require use of screened, select fill one foot below and one foot above the geomembrane. A drainage layer will also be required above the geomembrane. A settlement period will be required between placement of the fill and installation of the geomembrane to allow the soft soils on the site to consolidate to minimize potential damage to the geomembrane. Repair and maintenance of the geomembrane in settlement areas will be necessary.

Alternative 6 – Fill with Processed Dredge Material

This alternative consists of filling the site with processed dredge material (PDM) that meets the guidelines contained in the RAW, has received an Acceptable Use Determination (AUD) and has been approved by the LSRP. The PDM will be placed in accordance with an approved grading plan that will raise the elevation above the flood level, provide positive drainage and provide for future site development. PDM will provide some structural stabilization of the existing perimeter berms.

The permeability of properly placed, fresh PDM is likely to be on the same order of magnitude or slightly less permeable than the underlying alum-YPS sludge, promoting more runoff and preventing trapping of water inside the impoundments, eliminating the problems identified in

Alternatives 3 and 4. Older PDM, not processed on site is likely to be more permeable than the underlying alum-YPS sludge. Logistics issues may preclude our ability to obtain and place fresh PDM as the primary remediation material.

Disadvantages with the use of PDM are the reliability of the supply, the lack of homogeneity among the various PDM sources and the need to obtain a site specific AUD from each PDM processor/generator/supplier. These uncertainties will likely extend the time required to complete the remediation and make it questionable if a sufficient volume of PDM can be obtained to complete the site remediation. Variation in the material characteristics will also require additional engineering during the remediation to ensure that the cap is stable and is consistent enough to meet the remediation goals.

Alternative 7 – Cap Site with Processed Class B Recyclable Soil (Preferred Alternative)

This alternative consists of capping the site with engineered fill soil manufactured at a temporary, dedicated Class B recycling facility. The dedicated facility would be located on a portion of the site to minimize double-handling and transportation costs and to control processed product consistency. The facility would be removed from the site upon completion of the remediation.

The engineered fill soil would be alternative fill soil that has been blended, screened and processed into a soil-cement product. This product will then be used as structural fill to form the cap. The product will meet the guidelines established in the RAW and will be approved by the LSRP. Because of the recycling process, the product will have consistent engineering properties. The product can be placed, spread and compacted to a close tolerance of engineering specifications.

The cap will be placed in accordance with an approved grading plan that will raise the elevation above the flood level, provide positive drainage and provide for future site development. The engineered fill product is a soil-cement that exhibits higher strength than unprocessed soil and will provide structural stabilization of the existing perimeter berms. The engineered fill will have lower permeability than the underlying alum-YPS sludge, eliminating the infiltration problems identified with Alternatives 3 and 4. This strength will also result in a more stable site following remediation, reducing maintenance costs and providing a broader range of future re-development options.

Comparison to Remediation Goals and Other Considerations

Before performing the detailed alternatives analysis as described by the NCP, EastStar evaluated each of the alternatives to the previously described remediation goals for the site. The alternatives were also compared for other considerations including compliance with SRRA, the extent of wetlands disturbance, time required for remediation, requirements for remedial action permits and administrative controls and the relative effort required for post remediation maintenance.

Achievement of the remediation goals for each alternative was judged to be very effective, effective, marginally effective or not effective. The other considerations were given qualitative results based upon the alternative.

The results of this comparison are summarized in Table 1. In general, all of the alternatives except for the Do Nothing alternative provide some benefit in achieving the remediation goals. Alternatives 3 and 4 provide the least benefit in achieving these goals because these alternatives do not control infiltration. Alternative 7 provides the most benefit for all of the alternatives.

In reviewing the other considerations, all of the alternatives, except for the Do Nothing alternative comply with SRRA. All of the other six alternatives disturb the same 85 acre contaminated area; and therefore they all result in the same extent of wetlands transition area and riparian buffer area disturbance.

Cost Analysis

Industry cost estimates were made for each of the alternatives based upon the scopes of work of the alternatives, the estimated quantities for remediation and typical unit prices for the work in the Carteret area. The cost estimates are provided in Table 2.

As can be seen from the cost estimates, Alternatives 2 and 3 are an order of magnitude higher in cost than the other alternatives. Alternatives 4 and 5 are estimated to be somewhat higher cost than Alternatives 6 and 7 but are not so high to preclude them from consideration. Alternatives 6 and 7 are estimated to be approximately the same cost, although Alternative 7 is estimated to be slightly higher cost because of the cost of permitting, constructing and operating the Class B facility.

Evaluation Criteria

The NCP lists nine criteria, contained in three groups, to be used to evaluate remediation alternatives:

- ❑ Threshold Criteria Group – Any alternative must meet all Threshold Criteria to be given further consideration
 - Overall protection of human health and the environment
 - Compliance with applicable or relevant and appropriate requirements (ARARs)
- ❑ Primary Balancing Criteria Group – This group consists of the main criteria used to evaluate and rank alternatives
 - Long term effectiveness and permanence
 - Reduction of toxicity, mobility or volume through treatment
 - Short term effectiveness

- Implementability
- Cost
- ❑ Modifying Criteria - This group includes additional criteria to be considered in remedy selection
 - State acceptance
 - Community acceptance

These criteria were used to evaluate the potential remediation alternatives for the Rahway Arch site. The extent that each alternative met each of the evaluation criterion was determined as:

- ❑ Satisfies the evaluation criterion to a high degree
- ❑ Satisfies the evaluation criterion
- ❑ Marginally meets the evaluation criterion
- ❑ Does not meet the evaluation criterion

The results of this evaluation are summarized in Table 3. Alternatives 1, 2, 3 and 4 were determined to be unsatisfactory. Alternative 1 is the Do Nothing alternative and does not provide any site remediation. The high cost of Alternatives 2 and 3 make them infeasible. Alternatives 3 and 4 do not control infiltration making them problematic on a long term basis.

Alternatives 5 and 6 were determined to be satisfactory options. They were not determined to be the preferred alternative because of the long term effectiveness concern and cost considerations for Alternative 5 and short term effectiveness and implementability considerations for the uncertain PDM supply for Alternative 6.

Alternative 7 was determined to be the preferred alternative. It provides the highest degree of compliance with all of the evaluation criteria. It is a proven technology that has been used successfully elsewhere in the State under similar geotechnical conditions. A viable design, construction sequence and monitoring program have been developed for construction of the cap for the existing site conditions using this material by the geotechnical engineer. Its short-term and long-term effectiveness are well demonstrated. It is fully protective of human health and the environment and complies with SRRA and all of the ARARs. Fundamental to this alternative are the ability to meet the project schedule and on-site control of the manufactured soil product to meet the necessary material properties required for cap construction.

The Borough of Carteret and Middlesex County are in support of this alternative. It complies with all of the remediation goals. Alternative 7 has a slightly higher cost than Alternative 6. However, the technical considerations outweigh the relatively small difference in cost, making it the preferred alternative.

Note that Alternative 7 does not preclude the use of acceptable PDM or possibly some unprocessed dredge material for specific applications as part of the site remediation. Use of

Mr. Pucillo
January 17, 2013
Page 10

these alternate materials for specific construction applications on the site that do not require the engineered fill product has been considered and is addressed in the RAW.

Based upon the results of this detailed alternatives analysis, the preferred alternative for site remediation is to cap the site with reduced permeability engineered fill manufactured by a temporary on-site Class B recycling facility. This alternative and the planned remedial action are fully described in the RAW.

If you have any questions regarding this analysis or would like to discuss this topic further, please call me at (410) 290-8777.

Sincerely,
EastStar Environmental Group, Inc.

A handwritten signature in cursive script, appearing to read "Albert P. Free".

Albert P. Free, P.E., CSP, LSRP
President

Mr. Pucillo
January 17, 2013

EVALUATION TABLES

**Rahway Arch Properties, LLC
Remediation of the Rahway Arch Site**

Table 1 - Comparison to Remediation Goals and Other Considerations

Evaluation Criteria	Alternative						
	1 Do Nothing	2 Excavate and Off-Site Disposal	3 In-situ Stabilization and Fill	4 Alternative Fill	5 Alternative Fill Geomembrane Cap	6 Processed Dredge Material	7 Processed Class B Soil Cap
Remediation Objectives							
Eliminate direct contact hazards	⊗	●	●	●	●	●	●
Prevent precipitation from contact with contaminated materials	⊗	●	○	○	●	⊙	●
Eliminate bathtub-like effect in impoundments	⊗	●	⊗	⊗	●	⊙	●
Promote stormwater runoff and evapotranspiration over infiltration	⊗	○	○	○	⊙	⊙	●
Ensure longterm stability of the containment berms	⊗	○	○	○	○	●	●
Eliminate site safety hazards	⊗	⊙	⊙	⊙	⊙	●	●
Raise site above floodplain	⊗	●	●	●	●	●	●
Allow safe passive uses and allow for possible future development	⊗	●	○	○	⊙	●	●
Other Considerations							
Compliance with SRRA	No	Yes	Yes	Yes	Yes	Yes	Yes
Extent of disturbance	none	85 acres	85 acres	85 acres	85 acres	85 acres	85 acres
Transition area disturbance	none	inside impounds	inside impounds	inside impounds	inside impounds	inside impounds	inside impounds
Time required for remediation	not applicable	long	moderate	moderate	moderate	long	moderate
Remedial action permit required	Yes	No	Yes	Yes	Yes	Yes	Yes
Administrative controls required	Yes	No	Yes	Yes	Yes	Yes	Yes
Level of ongoing maintenance required	High	Low	High	High	High	Moderate	Moderate

Evaluation key:

- - Very effective
- ⊙ - Effective
- - Marginally effective
- ⊗ - Not effective

**Rahway Arch Properties, LLC
Remediation of the Rahway Arch Site**

Table 2 - Relative Cost Analysis

Cost Item	Alternative						
	1 Do Nothing	2 Excavate and Off-Site Disposal	3 In-situ Stabilization and Clean Fill	4 Alternative Fill	5 Alternative Fill Geomembrane Cap	6 Processed Dredge Material	7 Processed Class B Soil Cap
Site Investigation	\$0	\$600	\$600	\$600	\$600	\$600	\$600
Engineering	\$0	\$500	\$500	\$300	\$400	\$300	\$300
Permitting	\$0	\$200	\$500	\$500	\$600	\$500	\$700
Costs During Remedial Activities							
Mobilization and SESC	\$0	\$360	\$360	\$360	\$360	\$360	\$560
Trenching, shoring and dewatering	\$0	\$85	\$0	\$0	\$0	\$0	\$0
Excavation	\$0	\$10,000	\$0	\$0	\$0	\$0	\$0
Disposal	\$0	\$160,000	\$0	\$9,200	\$9,200	\$0	\$42
Fill material purchase	\$0	\$71,700	\$23,000	\$0	\$0	\$0	\$0
Fill material handling & placement	\$0	\$20,100	\$10,700	\$10,700	\$10,700	\$10,700	\$11,500
In-situ stabilization	\$0	\$0	\$267,000	\$0	\$0	\$0	\$0
Geomembrane	\$0	\$0	\$0	\$0	\$4,250	\$0	\$0
Stormwater management	\$0	\$500	\$500	\$500	\$500	\$500	\$500
Geotechnical engineering	\$0	\$1,000	\$1,000	\$750	\$1,000	\$750	\$500
LSRP	\$0	\$100	\$100	\$250	\$250	\$400	\$250
Total Estimated Cost (1)	\$0	\$265,000	\$304,000	\$23,200	\$27,900	\$14,100	\$15,000
Relative Maintenance Costs	High	Low	High	High	Moderate	Low	Low

Costs are in \$1,000.

(1) - Alternative cost is exclusive of any contractual or lease finance considerations

Estimated quantities

Unit Costs

**Rahway Arch Properties, LLC
Remediation of the Rahway Arch Site**

Table 3 - Detailed Alternatives Analysis

Evaluation Criteria	Alternative						
	1 Do Nothing	2 Excavate and Off-Site Disposal	3 In-situ Stabilization and Fill	4 Alternative Fill	5 Alternative Fill Geomembrane Cap	6 Processed Dredge Material	7 Processed Class B Soil Cap
Threshold Criteria							
Overall protection of human health and the environment	⊗	⊙	○	○	⊙	●	●
Compliance with ARARs	⊗	⊙	○	○	●	●	●
Primary Balancing Criteria							
Long-term effectiveness and permanence	⊗	●	⊗	⊗	○	⊙	●
Reduction of toxicity, mobility or volume through treatment	⊗	●	○	○	⊙	⊙	⊙
Short-term effectiveness	⊗	○	⊙	⊙	●	○	●
Implementability	⊗	○	○	●	●	○	●
Cost (\$1,000)	\$0	\$265,000	\$304,000	\$23,200	\$27,900	\$14,100	\$15,000
Modifying Criteria							
State acceptance	⊗	⊙	⊙	⊙	⊙	⊙	⊙
Community acceptance	⊗	○	○	⊙	⊙	⊙	●
Overall Evaluation	unsatisfactory	unsatisfactory	unsatisfactory	unsatisfactory	satisfactory	satisfactory	preferred

Evaluation key:

- - Satisfies the evaluation criterion to a high degree
- ⊙ - Satisfies the evaluation criterion
- - Marginally meets the evaluation criterion
- ⊗ - Does not meet evaluation criterion